

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HARVINDER P. JULKA,

Plaintiff

-against -

THE AUTOMOBILE INSURANCE COMPANY  
OF HARTFORD, CONNECTICUT AND THE  
TRAVELERS PROPERTY CASUALTY COMPANY,

Defendants.  
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**RULE 26 INITIAL  
DISCLOSURES OF  
PLAINTIFF**

**08 CV 2410 (CLB)(GAY)**

In accordance with Rule 26 of the Federal Rules of Civil Procedure, Plaintiff, HARVINDER JULKA, but his attorneys, Law Offices of Anthony J. Pirrotti, P.C., hereby discloses as follows:

**A. Individuals with Discoverable Information**

1. Plaintiff incorporates by reference all persons listed by Defendant in their Rule 26 disclosures.

2. Plaintiff hereby identifies all persons referenced in any documents produced by parties to this action as part of their disclosures and/or in response to discovery demands.

**B. Documents**

1. All documents listed by Defendant in his Rule 26 disclosures, as well as additional documents produced in response to discovery demands in this action.

2. All documents provided to the Defendant by the Plaintiff prior to the institution of this action.

3. Plaintiff reserves the right to supplement this disclosure as discovery continues.

**C. Computation of Damages**

The Plaintiff is seeking damages due to the pecuniary loss suffered due to the damage to and ultimate destruction of his home. The Plaintiff is also seeking damages due to the cost of tearing down and replacing the home without fixtures and kitchen, which amounts to \$345,000.00. Additionally, the Plaintiff is seeking damages for the replacement cost of the fixtures/kitchen in the amount of \$50,000.00. The documentation supporting these damages has been previously submitted in response to defendant's demands for documents. The Plaintiff is also claiming damages for loss of use, hardship, inconvenience and annoyance that has resulted from the loss of his home. Finally, the Plaintiff is seeking punitive damages and attorney's fees.

Dated: Ardsley, New York  
June 10, 2008

Yours, etc.,



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ANTHONY J. PIRROTTI, ESQ. (AJP0109)  
LAW OFFICES OF ANTHONY J. PIRROTTI P.C.  
Attorneys for Plaintiff  
501 Ashford Avenue  
Ardsley, New York 10502  
(914) 693-8000

TO: ALAN C. EAGLE, ESQ. (ACE 3451)  
RIVKIN RADLER LLP  
Attorneys for Defendants  
926 Rex Corp Plaza  
Uniondale, New York 11556-0926  
(516) 357-3000

STATE OF NEW YORK )  
COUNTY OF WESTCHESTER) ss:

ANNE K. BRACKEN, being duly sworn, deposes and says:

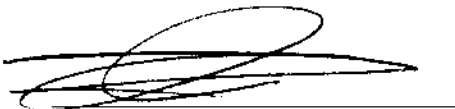
I am not a party to the action, am over the age of eighteen (18), and reside at Stormville, New York.

On **June 10, 2008**, I served the within **PLAINTIFF'S RULE 26 INITIAL DISCLOSURE** by depositing a true copy thereof, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

ALAN C. EAGLE, ESQ. (ACE 3451)  
RIVKIN RADLER LLP  
Attorneys for Defendants  
926 Rex Corp Plaza  
Uniondale, New York 11556-0926  
(516) 357-3000

  
ANNE K. BRACKEN

Sworn to before me this  
10th day of June, 2008



NOTARY PUBLIC

ANTHONY J. PIRROTTI  
Notary Public, State Of New York  
No. 248381860  
Qualified In Westchester County  
Commission Expires December 31, 2010